# Exhibit 2

## RE: Applied Minds LLC v. Guild Hall Subpoena

## orin@ketyerlegal.com <orin@ketyerlegal.com>

Fri 6/7/2024 11:40 AM

To:Charles Moulins <CMoulins@fenwick.com>
Cc:Joseph Belichick <JBelichick@fenwick.com>;Molly Melcher <mmelcher@fenwick.com>;Justine Vandermel
<Justine.Vandermel@fenwick.com>

#### \*\* EXTERNAL EMAIL \*\*

Mr. Moulins.

We can agree to disagree on whether MASS waived objections to the subpoena. For avoidance of doubt, MAASS reserves all it rights in this regard.

Notwithstanding the foregoing, we accept your offer to extend the compliance deadline until June 20, 2024 on the terms you outlined in your email.

Thanks your for your cooperation and assistance.

Regards,

Orin Ketyer
President
Ketyer Legal & Risk Management Services
1376 Sally Court
East Meadow, NY 11554
646-287-1049
www.KetyerLegal.com

From: Charles Moulins < CMoulins@fenwick.com>

Sent: Friday, June 7, 2024 11:08 AM

To: orin@ketyerlegal.com

**Cc:** Joseph Belichick < JBelichick@fenwick.com>; Molly Melcher < mmelcher@fenwick.com>; Justine Vandermel

<Justine.Vandermel@fenwick.com>

Subject: RE: Applied Minds LLC v. Guild Hall Subpoena

Mr. Ketyer—

Thank you for our call to discuss the subpoena served on your client by Applied Minds on May 25, with a return deadline of June 6. For the record, we have not yet reached any agreement on extending the compliance deadline. Additionally, as discussed, pursuant to Rule 45, MAASS has already waived all objections to the subpoena by failing to provide any substantive response by the June 6 deadline. Nevertheless, Applied Minds is willing to allow MAASS until June 20, 2024 to produce all the subpoenaed documents before seeking judicial intervention, **provided** that it confirms its agreement to substantial compliance with all subpoena requests by that date. Please confirm MAASS's agreement to those terms. Applied Minds reserves all rights in this matter.

Best, Charles

#### **Charles Moulins**

Fenwick | Associate | +1 212-430-2640 | CMoulins@fenwick.com

From: orin@ketyerlegal.com <orin@ketyerlegal.com>

Sent: Friday, June 7, 2024 9:52 AM

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**To:** Charles Moulins < <a href="mailto:CMoulins@fenwick.com">CMoulins@fenwick.com</a>> **Subject:** Applied Minds LLC v. Guild Hall Subpoena

#### \*\* EXTERNAL EMAIL \*\*

Mr. Moulins,

As per our conversation, I am MASS LLC's corporate counsel. Thank you for agreeing to a two week extension for MAASS LLC to respond to the subpoena. As discussed, please confirm this extension in writing. In the interim I have spoken to my client to ensure that the process of compiling the responsive documents is not delayed.

Thank you for the professional courtesy extended.

Regards,

Orin Ketyer
President
Ketyer Legal & Risk Management Services
1376 Sally Court
East Meadow, NY 11554
646-287-1049
www.KetyerLegal.com